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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

DONALD J. TRUMP FOR PRESIDENT,
INC., REPUBLICAN NATIONAL
COMMITTEE, NEW JERSEY
REPUBLICAN STATE COMMITTEE,

Plaintiffs,

v.

TAHESHA WAY, in her official capacity
as Secretary of State of New Jersey,

Defendant.

No. 3:20-cv-10753-MAS-ZNQ

DECLARATION OF DAVID HUGUENEL

I, David Huguenel, declare:

1. I am the National War Room Director of Donald J. Trump for President, Inc. (“DJTFP”). I am over the age of eighteen and I have personal knowledge of the following facts. If called as a witness, I could and would competently testify thereto.

2. DJTFP is a plaintiff in this action, is the principal committee for President Donald J. Trump's reelection campaign, and is headquartered at 725 Fifth Avenue, 15th Floor, New York City, NY 10022. DJTFP spends resources, including hiring campaign staff in New Jersey to encourage New Jerseyans to reelect the President. It also spends significant sums of money in New Jersey to further those interests.

3. Election Day Operations are a critical part of DJTFP's election strategy. Election Day Operations includes hiring poll watchers to observe voting and observe the counting of ballots on Election Day. Poll watchers are also needed to observe counting by-mail ballots on Election Day and the two following days to confirm whether they were postmarked on or before Election Day.

4. Election Day Operations also includes training and recruiting poll watchers, monitoring election-related developments throughout the State, and working with state and local officials on a daily basis to resolve any issues that may arise, among other things.

5. Changes to New Jersey election laws require DJTFP to change how it allocates its resources and the time and efforts of its campaign staff, to achieve its electoral and political goals.

6. A4475 changed New Jersey's election laws in at least two ways that have affected DJTFP and how it allocates its finite resources. First, A4475 now allows election officials to begin counting mail-in ballots ten days before Election Day. Second, it now allows election officials to count "[e]very ballot without a postmark, and ballots mis-marked and confirmed by the post office that those ballots were received by the post office on or before November 3, 2020."

7. These changes have the effect of extending Election Day both forward and backward. As a result, DJTFP must change its Election Day Operations because of A4475.

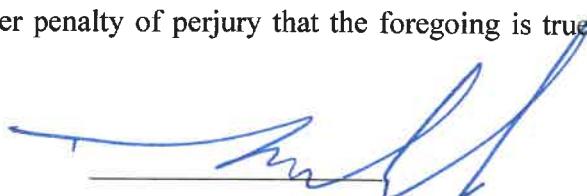
8. In particular, A4475 has forced DJTFP to divert its resources in response to A4475's changes. For example, DJTFP has had to hire a new state elections director to respond to the A4475's changes. The new elections director must divert additional DJTFP resources that would have been expended on other components of its mission to recruit, hire, and train more poll watchers than would otherwise be needed to monitor the counting of ballots for ten additional days before the election. The new elections director must also recruit, hire, and train more poll watchers to monitor the receipt and counting of by-mail ballots without a postmark after the election.

9. These additional pollworkers will also have to monitor when election officials contact the post office to determine whether ballots that have been "mis-marked" were actually received by the post office on or before Election Day.

10. Because DJTFP's resources are finite, it can expend resources responding to A4475 only by diverting them from the pursuit of its mission in other areas.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed September 26, 2020

A handwritten signature in blue ink, appearing to be a stylized 'J' or a similar character, is written over a horizontal line.